

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
Section 68.4(a) of the Commission's Rules	)	WT Docket No. 01-
	309	
Governing Hearing Aid-Compatible Telephones	)	RM-8658

**Hearing Aid Compatibility Report**

Thumb Cellular LLC ("Reporter"), a digital wireless service provider, pursuant to the Federal Communications Commission's ("Commission" or "FCC") *Order* in WT Docket No. 07-309, FCC 03-168, 29 CR 1299 (August 14, 2003), at the staff's request, hereby files a supplemental report concerning the availability of digital phones for the hearing impaired.<sup>1 2</sup> Please note that the instant filing provides additional information regarding Reporter's efforts to secure HAC compliant handsets compared to what was presented in the June 1, 2007 filing. The additional information is found in paragraph #5 below; all other information is unchanged.

1) Does Reporter currently comply with Section 20.19(d)(2) of the Commission's Rules? **Response:** Yes.

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<sup>1</sup> On July 7, 2004 the FCC published notice that it had obtained OMB approval to collect hearing aid compatibility reports from wireless carriers. 69 Fed. Reg. 40928 (Wednesday, July 7, 2004). Pursuant to the *Report and Order, Amendment of Section 68.4(a) of the Commission's Rules Governing Hearing Aid-Compatible Telephones*, 68 Fed. Reg. 54173 (September 16, 2003), reports are due every six months after rule effectiveness for the first three years and then annually for the next two years. The first reports were filed in November 2004.

<sup>2</sup> The staff clarified that the waiver request should not be withdrawn; we appreciate the staff comment and Reporter withdraws the withdrawal request.

2) On what date did Reporter first comply? **Response:** Reporter was fully compliance as of November 14, 2006.

3) For each interface for which waiver is sought, which 2 handsets were offered on the initial compliance date? Please provide the manufacturer name, model number, and FCC ID number of these 2 t-coil certified handsets. **Response:** Reporter received its first inductive coupling compliant handset, Nokia 6265i, on September 7, 2006. Reporter achieved full compliance on November 14, 2006, when it received the Nokia 6165i. The manufacturer's names, model numbers, and FCC equipment ID numbers are provided below for each of the t-coil compliant handsets Reporter currently distributes. Please note that the FCC ID#s listed below were taken directly off new handsets in stock; Reporter is unable to obtain FCC ID#s from handsets which have been sold and are no longer in Reporter's control.

Nokia 6265i -- first received 9/7/06, FCC ID# QMNRM-66  
Nokia 6165i -- first received 11/14/06, FCC ID# QMNRM-125  
Motorola V323i -- first received 2/23/07, FCC ID# IHDT56GS1  
Motorola K1m -- first received 2/2/07, FCC ID# IHDT56GH1  
Motorola L7c -- first received 4/3/07, FCC ID# IHDT56GQ1  
Motorola 3Vm -- first received 4/3/07, FCC ID# IHDT56FT1

4) Additional information in support of the waiver request: As a small carrier Reporter must wait until a "generic" version of a handset is made available to it. Typically handsets are made available to the larger carriers (i.e., Verizon, Sprint, etc.) several months prior to becoming available to Reporter. All handsets must go through Reporter's testing and approval process before Reporter distributes them. Reporter is able to "special order" handsets prior to them being added to its line-up for testing purposes, but Reporter still has to wait until the generic version is made available through Reporter's vendors before Reporter can order sufficient quantities for inventory/sale.

5) It appears that Reporter's October 2006 *Hearing Aid Compatibility Report* erroneously reported that Reporter could not obtain any T-coil compliant handsets. Overlooked was the fact that Reporter had the Nokia 6265i in stock as of September 7, 2006. Reporter regrets the error. From September 18, 2006, the time when the T-coil requirement became effective, to the time that Reporter obtained its second T-coil compliant handset in November 2006, Reporter kept abreast of the availability of HAC compliant handsets through periodic discussions with its vendors and with members of its carrier trade group. In early November 2006 Reporter learned that it could obtain the Nokia 6165i for stock and Reporter immediately placed an order for the handset. Reporter took delivery of handsets for stock shortly thereafter on November 14, 2006. It is respectfully submitted that Reporter worked diligently to obtain HAC compliant handsets, that the time of non-compliance was brief, that Reporter offered at least T-coil HAC compliant handset as of September 18, 2006, and that grant of the requested waiver would serve the public interest.

June 11, 2007

Respectfully Submitted,  
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